

FILED

Shaheryar Khan

2219 Olive street

Burbank Ca 91506

Plaintiff In proper

2023 JAN 12 PM 12:19

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELESBY: EE

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SHAHERYAR KHAN

CASE NUMBER 2:22-CV-02333

PLAINTIFF,

PLAINTIFFS MOTION TO LEAVE
TO AMEND THE COMPLAINT

ADAM KRAEMER ET AL

DEFENDANTS,

JUDGE: Maame Ewusi Mensah Frimpong

DATE: April 6th 2023

Time 10 AM

CRTRM: 8 AM 8TH FLOOR

ACTION FILED: APRIL 7 TH 2022

I AM THE PLAINTIFF IN THIS MATTER, I FILED THIS CASE ON 4/7/22.

On 12-13-2022 I was granted an extension to serve summons in the form of waiver of the summons and notice of lawsuit under rule 4. This extension motion will serve as an update and request for extension

for procedural reasons.

I filed a motion to extend time on January 12th 2023 as time is still pending for response for defendants to answer the complaint

certain agents for the defendants have rejected the service due to the names on the complaint being spelled incorrectly. I am request leave to amend the complaint to correct this issue.

I will hire legal counsel to do this for me.

I will file additional evidence under seal the issue of additional defendants and current defendant in criminal matter related to this case and additional actions and defendants needing to be added in this case due to fraud occurring to me while my cases were pending.

Plaintiff suffers from injury during this case and my condition warrant the need to for legal counsel and I request leave to amend the complaint as he sees necessary.

DUE TO THIS INJURY PLAINTIFF SUFFERS A UNIQUE MEDICLA CONDITION OF SEVERE EMOTIONAL DISTRESS AND REQUIRE THE AID OF COUNSEL.

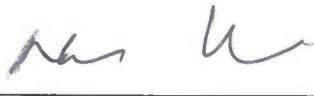
Separately Judge Vurzolo in my bankruptcy hearing in the discussions for my request to hire council stated that he would not be hold me back from hire council thus without court approval stating his comfort with plaintiff and Debtor in this proceeding and other to hire council. I was seriously Injured on 6/20/2022 which affected my condition and job and had difficulty doing basic tasks and require the aid of council for my case.

Due to a major issue that I have had problems with: Plaintiff has been victim of tampering in my cases: and additional defendants will be requested to leave to amend to add these defendants (APPLE VS NSO, QTECH) and also allow plaintiff to add additional caused of action. Plaintiff was victim of theft of materials related to the case and spoliation of certain items plaintiff relies on for this case. Plaintiff will require discovery to be conducted when defendants appeal in this case. plaintiff will require judicial notice of this issue.

Plaintiff will proceed with legal counsel and wish to leave to amend this motion and complaint with counsel's aid and supports the plaintiffs need for proper advice and pleading for due process.

I declare under the penalty of perjury the foregoing is true and correct.

1/12/2023



X SHAHERYAR KAHN

PLAINTIFF IN PRO PER